

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated</i> , Plaintiffs, vs. National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc., Defendants.
THIS DOCUMENT RELATES TO: DK#7151

No. 2:12-md-02323-AB MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**MOTION TO ACCEPT JOINDER IN OBJECTIONS TO CO-LEAD CLASS
COUNSEL'S PETITION FOR FEES FILED ON MARCH 28, 2017**

Undersigned counsel, LORENZO WHITE, and 94 others who are Retired NFL Players and members of the Class certified in this matter, file this Motion to Accept Joinder in Objections Filed on March 28, 2017 [ECF No. 7375] in response to Co-Lead Counsel's Petition for an Award of Attorney's Fees [ECF No. 7151], and in support thereof states as follows:

1. On March 8, 2017, this Court entered an Order [ECF 7261] holding, among other things, that all objections to Co-Lead Class Counsel's Petition for an Award of Attorneys' Fees [ECF 7151] must be filed by March 27, 2017.
2. On March 27, 2017, Undersigned counsel, LORENZO WHITE, and 94 others who are Retired NFL Players and members of the Class certified in this matter, attempted to file their joinder in objection through the online portal.

3. The online portal was not giving undersigned counsel the ability to file and the help desk for CM/ECF for the Eastern District of Pennsylvania was closed at the time the document was attempted to be filed.

4. In an abundance of caution, undersigned counsel sent an email to co-lead counsel Christopher Seeger, Esq., who had originally filed the Petition for an Award of Attorney's Fees, to inform them of the issue and attaching the joinder thereto.

5. Federal Rule of Civil Procedure 6(b)(1)(B) provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time . . . on motion made after the time has expired if the party failed to act because of excusable neglect.

Fed. R. Civ. Pro. 6(b)(1)(B).

6. The undersigned counsel acted in good faith in preparing and attempting to file the Joinder in Objections within the deadline, and sent an email to co-lead counsel in an attempt to minimize any potential prejudice filing the next day may have on co-lead counsel.

WHEREFORE, the undersigned attorney respectfully requests that the Court grant their motion to accept their joinder in objection as timely filed, even though it was filed the next day due to not having access to the e-filing portal on the 27th.

Respectfully submitted,

**WEISBERG & ASSOCIATES,
Attorneys At Law**

s/ Lawrence Weisberg

Fla. Bar No. 962198

21301 Powerline Rd. #100

Boca Raton, FL 33433

Telephone: (561) 362-7355

Facsimile: (561) 880-6570

[LWeisberg@WeisbergLegal.co](mailto:LWeisberg@WeisbergLegal.com)

[m](mailto:LWeisberg@WeisbergLegal.com) Attorney for Individual Class

Members

CERTIFICATE OF SERVICE

I CERTIFY that the above has been filed with the Clerk of Court's EF/ECM system, which will provide service to all parties designated to receive service this March 29, 2017.

s/ Lawrence Weisberg

Lawrence Weisberg, Esq.